

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

Retail Access Optimization Initiative, 2011

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Docket No. N2011-1

MOTION OF VALPAK DIRECT MARKETING SYSTEMS, INC. AND  
VALPAK DEALERS' ASSOCIATION, INC.  
TO ADMIT INTO EVIDENCE THE RESPONSES OF  
UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES VP/USPS-1(a-b), (d), 2(a) and VP/USPS-T1-10  
(September 28, 2011)

Pursuant to Commission Rules of Practice and Procedure § 3001.21, Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. (hereinafter "Valpak") hereby move for admission into evidence and incorporation into the record the following responses to interrogatories of the United States Postal Service:

VP/USPS-1(a-b), (d) and 2(a) (September 13, 2011)

VP/USPS-T1-10 to USPS witness Boldt, answered by USPS (September 19, 2011)

Two copies of the above documents are submitted herewith to the Secretary of the Commission.

Valpak filed interrogatories VP/USPS-1-4 and VP/USPS-T1-1-12 on August 30, 2011. The Postal Service filed the above-referenced responses on September 13, 2011, and September 19, 2011, subsequent to the hearing on September 8, 2011, wherein the Postal Service testimony and written discovery were received into the record. Therefore, this motion should be considered timely. Furthermore, the Postal Service has stated that they do not oppose this motion.

Valpak believes that the Postal Service's responses to interrogatories VP/USPS-1(a-b), (d), 2(a) and VP/USPS-T1-1-10 provide important information relevant to the issues in this docket and should be part of the evidentiary record.

Respectfully submitted,

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